

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
(Lynchburg Division)

In re)
)
) Chapter 13
JASON WAYNE VAUGHN,)
) Case No. 25-60666
Debtor.)
)
)

JOINDER TO MOTION TO DISMISS WITH RESTRICTIONS ON RE-FILING

Marion Lancaster, by counsel, states the following as her joinder to the *Motion to Dismiss with Restrictions on Re-Filing*, filed by Farmers Bank of Appomattox. ECF No. 9:

1. Ms. Lancaster is the holder of a promissory note in the original principal amount of \$165,000 from the debtor (the “Note”).
2. The Note is secured by a deed of trust against the property commonly known as 4137 Warminster Church Road, Buckingham, Virginia 23921.
3. The debtor defaulted under the terms of the Note and Ms. Lancaster scheduled a foreclosure sale. Prior to the scheduled foreclosure sale, on April 14, 2025, the debtor filed a petition under Chapter 13, Case No. 25-60450. The petition was not accompanied by any schedules or statement of financial affairs. The debtor did not file any further documents as required and the case was dismissed on April 30.
4. The debtor filed the present case on June 9, 2025, again, without any of the required schedules or statement of financial affairs. The deadline for the debtor to supplement his filing has now passed.
5. The repeated *pro se* filings without the required financial disclosures evinces an attempt to frustrate creditors instead of a good faith reorganization of his debts. The Court

should not countenance this activity. The arguments of Bank of Appomattox are incorporated herein.

WHEREFORE, Ms. Lancaster joins in the request of Bank of Appomattox to dismiss this bankruptcy case with prejudice to refiling for one year.

MARION LANCASTER

By: /s/ Kevin J. Funk
Counsel

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CERTIFICATE OF SERVICE

I hereby certify that I have this 16th day of July 2025, served a true copy of the foregoing Joinder on the following entities in the following manner:

Angela M. Scolforo, Trustee (ECF)

VIA US MAIL
Jason Wayne Vaughn, Debtor
4137 Warminster Church Road
Buckingham, VA 23921

/s/ Kevin J. Funk